

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

RE: BAY STATE GAS COMPANY

DTE 06-31

FOURTH SET OF INFORMATION REQUESTS OF LOCAL 273

UWUA 4-1: [See p. 44 of DTE 98-31]

(a) Has Bay State ever sought “recovery of the annual amortization of the acquisition premium in future [post-98-31] rate proceedings?” If yes, please specify the docket number and date of the filing.

(b) If the answer to (a) is “no,” has Bay State (or any related company) calculated the extent of merger-related savings? If such a savings calculation has been performed, please provide a copy of the calculation including all related work papers.

UWUA 4-2: [See UWUA 1-1]

Please provide a copy of Kathleen O’Leary’s resume.

UWUA 4-3: [See UWUA 1-2, Att. A, p. 1 of 3]

Has the company reviewed or analyzed why the 12-month average reported satisfaction with “amount of time it took to complete transaction on IVRU” dropped to 75% in the 1st quarter of 2006. In your answer, please define “IVRU” and confirm that the reported 75% figure is 225 lower than the prior 12-month average.

UWUA 4-4: [See UWUA 1-2, Att. A, p. 3 of 3]

(See UWUA 1-2, Att. A, p. 3 of 3) Please confirm that 99% of customers surveyed in the 1st quarter of 2006 found the skill and knowledge of the field service rep/work crew to be 6 or higher on a ten point scale.

UWUA 4-5: [See UWUA 1-3]

Did Mr. Bryant have any conversations or meetings with any Department Commissioners prior to the filing of DTE 05-27 regarding the rate increase in general or any specific any issue raised

by that filing? If so, please provide the date(s) of any such conversations or meetings; who participated in the conversations or meetings; and any notes of such conversations or meetings.

UWUA 4-6: [See UWUA 1-4, p. 3]

When did Bay State respond to Christopher Bourne's letter dated January 12, 2005, regarding replacement of cast iron pipe equal to/less than 8" in diameter? If the response is within the materials provided in UWUA 1-4, please specify the pages. If not within 1-4, please provide any response to the January 12, 2005 letter.

UWUA 4-7: [See UWUA 1-4, p. 11]

When did Bay State respond to this Notice of Probable Violation dated March 16, 2005? If the response is within the materials provided in UWUA 1-4, please specify the pages. If not within 1-4, please provide any response to the March 16, 2005 letter.

UWUA 4-8: [See UWUA 1-4, p. 91]

Please describe any actions that Bay State took in response to Christopher Bourne's letter dated July 7, 2005, regarding inspection of company-owned "piping that is located inside a customer's premises," and include any responsive written communications (letters, e-mails, etc.) sent to the Department.

UWUA 4-9: [See UWUA 1-4, pp. 96, 113]

Please describe the current status of the complaints Stiles & Hart Brick Company has raised with the company, including (i) whether the company ever reinstalled "the gas meter and associated piping and equipment" as referenced in Christopher Bourne's January 10, 2006 letter [include details of any reinstallation work]; (ii) whether the meter was tested after January 10, 2006 [include test results]; and (iii) whether the dispute between Stiles & Hart and the company has been resolved.

UWUA 4-10: [See UWUA 1-4, p. 99]

Please describe any actions that the company has taken in response to Christopher Bourne's letter of October 3, 2005, and include copies of any written documents reflecting any changes to the company's practices, procedures or operations manuals.

UWUA 4-11 [See UWUA 1-4, pp. 107-110]

Please explain what type of information is conveyed in a "Cut Off Report." Please explain the columns "installation date," "inactive date," "compliance date" and "cut-off date" in the report. Also explain why "active accounts" are included in a cut off report,

UWUA 4-12 [See UWUA 1-4, p. 115]

When did Bay State respond to this request from Christopher Bourne, dated January 18, 2006, to provide a report regarding cast iron replacement? If the response is within the materials provided in UWUA 1-4, please specify the pages. If not within 1-4, please provide any response to the January 18, 2006 letter.

UWUA 4-13: [See UWUA 1-4, p. 125]

When did Bay State respond to this Notice of Probable Violation dated January 12, 2006? If the response is within the materials provided in UWUA 1-4, please specify the pages. If not within 1-4, please provide any response to the January 12, 2006 letter.

UWUA 4-14: [See UWUA 1-4, pp. 158-162]

(a) Are pages 159 to 162 of UWUA 1-4 all of the pages submitted in connection with the company's March 15, 2006 compliance filing in DTE -5-27 (see p. 158). If not, please provide references to any other pages in UWUA 1-4 that were part of the March 16, 2006 filing, or provide actual copies of any additional documents filed with the March 16, 2006 compliance filing.

(b) [Page 160] Please explain why there are no "planned" feet of replacement for mains or services.

(c) In the "Mains" category, please explain why over 90% of the municipal bare steel replacement and over 80% of the municipal coated steel replacement was within the Brockton division.

(d) Please explain the categories "municipal," "emergency" and "other."

(e) (Page 161] Please provide information comparable to the "Type 2 Leaks" report but for the years 2003 and 2004 (mains and services, by geographic division).

UWUA 4-15: [See UWUA 1-6]

Please provide copies of any written complaints received, or logs or oral complaints, from Bay State employees regarding any handling or processing of complaints at the San Jose, Costa Rica facility.

UWUA 4-16: [See UWUA 1-7, Att. C]

Please confirm that the 2005 capital budget for New Business was revised downward from \$11.059 million to \$8.951, and that the Betterment budget was revised downward from \$3.8 million to \$2.775 million. Also explain why the revisions were made.

UWUA 4-17: [See UWUA 1-7, Att. D]

(a) Please explain why the budget for materials and supplies was reduced from \$3.864 million to \$2.396 million, 2005 to 2006; why rents and leases declined from \$4.808 to \$3.403; why corporate services declined from \$28,553 to \$22,559.

(b) Please explain why pensions declined from \$4,125,000 to \$222,000, and why FAS106 Medical & Life declined to zero.

UWUA 4-18: [See UWUA 1-9]

In light of the various statements in DTE 98-31 by the Department regarding Bay State's apparent intent regarding future staffing levels, e.g., that at the time of the merger NiSource had an "expressed intent to avoid layoffs at Bay State" and "consider[ed] a strong local presence and management at Bay State to be a critical component of the combined system's long-term objectives," [DTE 98-31, at 50], please provide any written documentation or notes of meetings that would support the statement that "the Department was aware that non-union staff and management positions would be consolidated," particularly to the extent that staff has actually been reduced since the decision in 98-31.

Respectfully Submitted,

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